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November 15, 2016

Nancy Vehr, Air Quality Administrator
Wyoming Department of Environmental Quality, Air Quality Division
200 West 17th Street
Cheyenne, Wyoming 82002

Via email: nancy.vehr1@wyo.gov and U.S. Mail

Dear Administrator Vehr:

The American Lung Association in Wyoming appreciates the opportunity to submit these comments on the Department's proposal to update Wyoming Air Quality Standards and Regulations, particularly as this action relates to the control of methane and other air emissions from new and modified oil and gas sources in the State of Wyoming.

The Department proposes to adopt by reference certain federal regulations – 40 CFR Part 60, Subparts OOOOa and TTTT – that establish emission standards for new oil and gas facilities. The implementation of these requirements will help prevent future health problems and premature deaths. The standards will reduce methane, volatile organic compounds (VOCs), and toxic air emissions in the oil and natural gas industry, and we support the Department's rigorous implementation and enforcement of these standards.

At the same time, we ask that you proceed with your efforts to address fugitive air emissions from oil and gas operations, also known as leak emissions, which are well known to comprise a significant amount of air pollution in the State of Wyoming. While the Federal Regulations to be adopted through this rulemaking address leak detection and repair to some degree, the more comprehensive leak detection and repair requirements that are in place in the Upper Green River Basin are proving to be workable and effective and should be implemented throughout Wyoming.

Oil and gas operations have expanded throughout Wyoming in recent years, and this expansion has been accompanied by increases in air pollution. The American Lung Association's 2016 State of the Air Report found that ground-level ozone pollution, a well-known byproduct of oil and gas development, increased in several Wyoming counties. The grades of seven counties dropped by one or two grades for ozone emissions despite a trend seen across the nation of lower ozone levels. The State of the Air Report linked worsened ozone levels in many areas of the western United States with increased oil and gas extraction, transmission, and processing activities.

Oil and gas operations emit significant amounts of air pollutants that threaten human health, including various air toxics such as benzene and formaldehyde, both known carcinogens, and other volatile organic chemical compounds. VOCs are harmful to health on their own and also lead to the formation of deadly ozone pollution. Collectively, these pollutants can harm the circulatory, respiratory, nervous, and other essential and vital life systems, and can cause cancer, developmental disorders, and premature death.

Oil and gas facilities also emit large quantities of industrial methane, a potent climate change pollutant. Climate change already threatens the health of millions of Americans, from extreme heat, increased air pollution, worsened wildfires, and more. The changing climate threatens the health of Americans alive now and in future generations.

Fugitive air emissions from oil and gas wells and other equipment constitute the second largest source of oil and gas related VOC pollution in the state, according to industry data. Effective measures to detect and promptly repair such leaks exist. In fact, the State of Wyoming approved a rigorous Leak Detection and Repair (LDAR) program in the Upper Green River Basin in order to address a serious ozone pollution problem stemming from increased oil and gas development in that region.

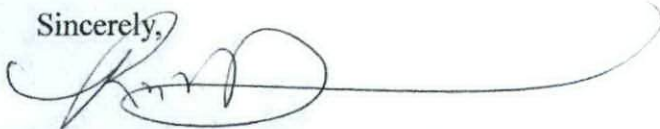
Implementation of LDAR requirements in the Upper Green River Basin is yielding positive results, with Sublette County showing improvements in its ozone pollution levels, according to the 2016 State of the Air Report.

Given the significant public health impacts from oil and gas related air pollution and the effectiveness of rigorous leak detection and repair requirements, the State of Wyoming should be implementing a statewide LDAR program that is commensurate with that in place in the Upper Green River Basin. While the federal regulations that this rulemaking intends to formalize contain leak detection and repair provisions, they are less rigorous than that being implemented in the Upper Green River Basin and thus will be less effective in protecting Wyoming citizens against dangerous air pollution.

Comprehensive leak detection and repair requirements are needed statewide to protect the most vulnerable populations today, as well as future generations.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ronni Flannery', with a long horizontal flourish extending to the right.

Ronni Flannery, Healthy Air Director
American Lung Association in Wyoming
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Missoula, MT 59801